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October 8, 2001

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

**Re: Docket to Determine the Compliance of BellSouth  
Telecommunications, Inc.'s Operations Support Systems with  
State and Federal Regulations  
Docket No. 01-00362**

Dear Mr. Waddell:

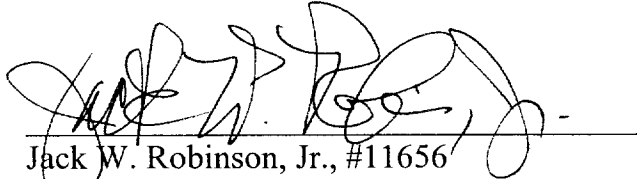
On behalf of AT&T Communications of the South Central States, Inc., I am responding to BellSouth Telecommunications, Inc.'s letter of October 5, 2001 regarding depositions scheduled in North Carolina Utilities Commission Docket No. P-55, Sub. 1022. In its letter, BellSouth lists five planned depositions and describes them as "regional depositions."

It is AT&T's position as the noticing party that the subject depositions being conducted under the North Carolina docket are separate and distinct from depositions to be taken in the TRA's OSS Docket (No. 01-00362). The TRA's OSS Docket has a different focus, different parties, and different procedural framework than the section 271 proceeding in North Carolina. Accordingly, depositions in Tennessee will likely be different than the deposition that have been taken and will be taken in the North Carolina proceeding. For example, since BellSouth has not yet responded to discovery or filed direct testimony in Tennessee, AT&T is unable to explore issues arising from these documents in the North Carolina depositions.

David Waddell, Executive Secretary  
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Should additional explanation of AT&T's position be necessary, AT&T welcomes the opportunity to address this issue at the pre-hearing conference set for Tuesday, October 9, 2001. We are filing herewith the original and thirteen copies of this letter and a copy will be provided to counsel of record.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jack W. Robinson, Jr.", is written over a horizontal line.

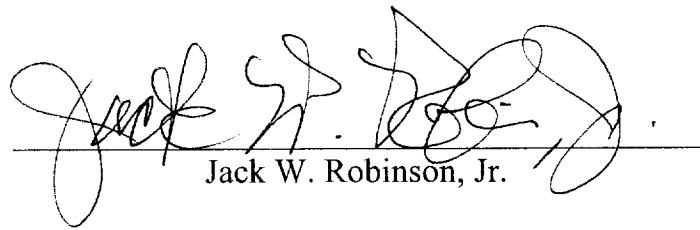
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David Waddell, Executive Secretary  
October 8, 2001  
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**CERTIFICATE OF SERVICE**

I, Jack W. Robinson, Jr., hereby certify that I have served a copy of the foregoing Letter on the following known counsel of record, by depositing a copy of the same in the United States Mail, postage prepaid, or by facsimile, this 8<sup>th</sup> day of October, 2001.



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